

City of Fall River, Massachusetts



LAW DEPARTMENT
ONE GOVERNMENT CENTER
FALL RIVER, MA 02722
508-324-2650 (Law Department)
508-324-2540 (Workers' Compensation)
508-324-2655 (Fax)
508-324-2000 (Voice/TDD)

ELAINE RUTKOWSKI
LEGAL ASSISTANT

NANCY PAVAO
WORKERS' COMPENSATION/
CLAIMS CLERK

THOMAS F. McGUIRE, JR.
CORPORATION COUNSEL
DANIEL S. HENDRIE
ASST. CORPORATION COUNSEL
JOHN J. COUGHLIN
ASST. CORPORATION COUNSEL
GARY P. HOWAYECK
SPECIAL ASST. CORPORATION COUNSEL

October 1, 2001

Clerk for Civil Business
United States District Court
District of Massachusetts
1 Courthouse Way
Boston, MA 02108

Re: Conservation Law Foundation vs. City of Fall River, et al
U.S. District Ct. 87-3067-Z

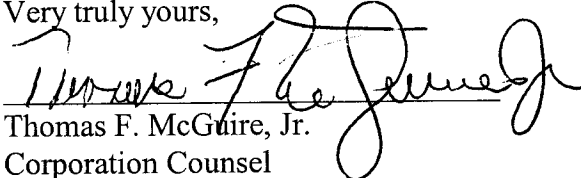
Dear Sir/Madam:

On behalf of the Defendant, City of Fall River, enclosed please find Quarterly Progress Report (Progress Report #38), a copy of which has been provided to the Plaintiff.

Be advised that under the Order issued by Judge Zobel with regard to this matter, said Quarterly Progress Report is required to be filed with the Court. Would you therefore, kindly file same.

If there are any questions or comments, do not hesitate to contact me.

Very truly yours,


Thomas F. McGuire, Jr.
Corporation Counsel

TFM/e
Enclosure

cc: Ronald A. Laro
Steven H. Burrington, Esq.
Terrance J. Sullivan

DUCKETED
175

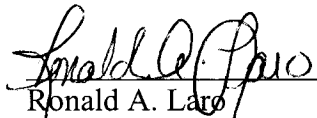
PROGRESS REPORT #38

October 1, 2001

1. CSO Construction Contract 2A-2 is comprised of the; South and Central Tunnels, associated drop shafts, diversion structures and connecting tunnels, tunnel odor control facility, and extreme event overflow structure. All required Federal and State Permits and associated easements (approximately 275) are in place or are under review.
2. CSO Project Land Acquisition of properties located at 137 and 159 Arnold Street was completed during this reporting period. Currently, CSO Project Land Acquisition of property located at 2100 Bay Street is under a Purchase and Sales Agreement, and is being processed Administratively.
3. The City, with its Engineer, conducted a CSO Program Evaluation and developed alternative measures which would continue to insure water quality standards and compliance with CSO Program objectives. Meetings have been conducted with Federal and Region I EPA Officials, and State DEP Officials to solicit acceptance of appropriate alternative measures. By attachment, and for your disposition, are copies of correspondence, both to and from, Region I EPA and the State DEP regarding these alternative measures.
4. The City shall be re-advertising for sealed bids for Contract 2A-2 by November 7, 2001. The estimated construction completion date of November 26, 2004 is compliant with the required Court Ordered Schedule completion date of December 31, 2004.

If further information is required, please call me at 508/324-2321.

Signed under the pains and penalties of perjury this 1st day of October 2001.



Ronald A. Laro
Director/Water Pollution Control

FALL RIVER SEWER COMMISSION
CSO WEEKLY PHYSICAL INSPECTIONS
AND
RAINFALL DATA

July - September 2001

COMMENTS

[illegible]

Monthly Operation and Maintenance Report
 Fall River Wastewater Treatment Facility
 Professional Services Group, Inc.
 7/1/01 to 9/30/01
 (Rainfall Data - Inches)

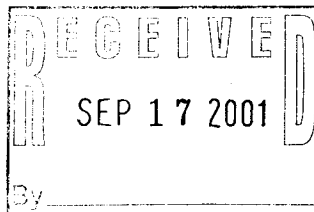
	<u>July</u>	<u>August</u>	<u>September</u>
1	0.02	-	-
2	-	-	-
3	-	-	-
4	0.09	-	0.06
5	0.72	-	-
6	-	-	-
7	-	-	-
8	0.03	-	-
9	-	-	-
10	0.41	0.18	-
11	0.32	0.02	-
12	0.24	0.38	-
13	-	0.92	-
14	-	0.02	0.10
15	-	-	-
16	-	-	-
17	0.06	-	-
18	0.02	-	-
19	-	-	-
20	-	1.47	0.01
21	-	-	0.99
22	-	-	0.38
23	-	-	-
24	-	0.08	-
25	-	-	0.30
26	1.77	-	-
27	0.01	0.05	-
28	-	-	-
29	-	-	-
30	-	-	0.21
31	-	-	-

(T) Trace Rainfall



JANE SWIFT
Governor

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHEAST REGIONAL OFFICE
20 RIVERSIDE DRIVE, LAKEVILLE, MA 02347 508-946-2700



BOB DURAND
Secretary

LAUREN A. LISS
Commissioner

August 7, 2001

The Honorable Edward M. Lambert, Jr.
City of Fall River
One Government Center
Fall River, Massachusetts 02722

RE: FALL RIVER
CSO Abatement Program

Dear Mayor Lambert:

Thank you for your recent correspondence concerning your Combined Sewer Overflow project that explained the options you are proposing in light of cost increases since the time of the Federal Court Order Amendment (1997). Please be advised that your requests for consideration of the Modified Tunnel Alternative Plan and Schedule Modification are still being reviewed.

As you are aware, the alternative plan to address CSOs to Mt. Hope Bay, through construction of several screening and disinfection facilities, was discussed during the meeting with EPA and City of Fall River officials on April 26, 2001. While few details were developed on this alternative plan at that time, the Department of Environmental Protection ("the Department") indicated that such an alternative represented a substantially lower level of CSO control to this sensitive-use receiving water than that afforded by the approved Tunnel Plan. Based on existing technical information, this alternative would not provide sufficient CSO control or water quality benefits to comply with state and federal CSO requirements. Therefore, the Department's position remains that screening and disinfection is not an appropriate technology to address CSOs to Mt. Hope Bay.

The concept of modifying and phasing the approved Tunnel Plan was also discussed at the April 26 meeting. A number of approaches were discussed to phase the CSO abatement work so that critical elements of the work can move forward expeditiously. As noted earlier, the Department is considering the benefits of such an approach and will respond to the City upon completion of our initial review. Additional technical detail on implementation of this strategy will be needed to support any formal request to modify the approved Tunnel Plan.

This information is available in alternate format by calling our ADA Coordinator at (617) 574-6872.

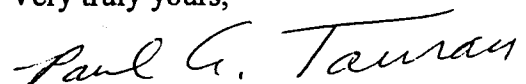
DEP on the World Wide Web: <http://www.state.ma.us/dep>

Printed on Recycled Paper

-2-

The Department looks forward to working with the City of Fall River to resolve outstanding CSO abatement issues. Please do not hesitate to contact me at (508) 946-2712 with any questions or if I can be of further assistance.

Very truly yours,

A handwritten signature in cursive script that reads "Paul G. Taurasi".

Paul Taurasi, P.E.
Regional Director

T/ddl/ka

cc: Terry Sullivan, Fall River DPW
Michael Wagner, EPA
Steve Couto, EPA
Ron Lyberger, DEP
Kevin Brander, DEP
Pat Hughes, CDM
CLF



City of Fall River Massachusetts

Edward M. Lambert, Jr.

One Government Center
Fall River, MA 02722
Tel. (508) 324-2600
Fax (508) 324-2626
(508) 324-2000 Voice/TDD

July 2, 2001

Mr. Paul Taurasi, P.E.
Regional Director, Southeast Regional Office
Massachusetts Department of Environmental Protection
20 Riverside Drive
Lakeville, Massachusetts 02347

Re: Request of Response for CSO Proposals

Dear Mr. Taurasi,

The City of Fall River, Massachusetts is currently under a Federal Court Order to implement a combined sewer overflow (CSO) abatement program. At the time of the most recent Court Order Amendment (1997) the total cost of the project, which is to be completed by the end of 2009, was estimated to be \$115 million. Since that Amendment, over \$30 million has been spent on the program, including \$23.4 million on construction.

The centerpiece of the CSO program is a storage/conveyance tunnel that is to be constructed in two phases. In January of this year, bids were opened on the first of the two major tunnel contracts. The low bid on this contract was \$99 million, which is \$23 million over the estimated cost. With this bid result, coupled with the current estimate for completion of the remaining components of the Court Order, it is currently estimated that the program (including the \$23.4 million already spent on construction) will cost \$267 million. This cost represents a \$152 million increase over the \$115 million cost estimate at the time of the Court Order, a cost which was authorized by a city-wide vote at that time.

As a result of the enormous increase in the estimated cost to complete the program, the City and its consultants have evaluated a wide range of potential options to the Court Ordered Plan. This evaluation has resulted in the development of two alternative plans: (1) the 2001 Alternate with South System Treatment; and (2) the 2001 Modified Tunnel Plan.

The City is interested in gaining the support of EPA and DEP for either of these two options prior to making an appeal to the Federal Court for a revision of its Order. There are certain advantages to each of the two alternative plans. The Alternate with South System Treatment has an estimated savings of \$69 million versus the Court Ordered

Plan. The 2001 Modified Tunnel has the potential for up to \$94 million in savings, but carries a higher construction cost risk factor than the Alternate with South System Treatment.

Request for Regulatory Response to the 2001 Alternate with South System Treatment

In order to determine which of the two alternative plans the City would present in its appeal to the Court, additional time (estimated to be one year) for study of the Alternate with South System Treatment would be required. This plan utilizes screening and disinfection technology at two sites for abatement of 5 CSO outfalls that currently discharge to Mt. Hope Bay.

At a meeting held at the DEP's Southeast Region office on April 26, 2001, preliminary information on both options was presented to representatives of both EPA and DEP. At that time, it was indicated to the City that approval of a plan utilizing screening and disinfection for abatement of the Mt. Hope Bay CSO outfalls would not be likely. If this is indeed the case, the City hereby requests an immediate written decision from the DEP and/or EPA indicating whether any plan incorporating treatment in the south and central area of the Mt. Hope Bay CSO outfalls with screening and disinfection will be allowed.

Request for Regulatory Response to the 2001 Modified Tunnel Plan

If EPA/DEP indicate that the 2001 Alternate with South System Treatment is "not approvable", the City would immediately pursue approval of the 2001 Modified Tunnel Plan (MTP). The MTP is similar to the Court Order, but with two technical differences of note: (1) the MTP would defer construction of the Extreme Event Outfall (EEO); and (2) the MTP would utilize screening and disinfection in place of the second CSO tunnel, the North System Tunnel.

The recently opened construction bid indicated that the cost of the EEO and related structures was approximately \$22 million. About \$20 million would be saved if the City were allowed to utilize some of the existing CSO outfalls for discharge in place of the EEO. The discharge frequency and volume would be the same as with the EEO, and would be in accordance with national CSO policy. Construction of this option would not eliminate the possibility of constructing the EEO at a later date. A decision on the need for the \$22 million EEO could thus be made using actual operating data versus theoretical modeling.

An additional feature of the MTP as it relates to the South/Central system is that it divides the South/Central construction into as many as 9 construction bids, which provides the City the benefits of cash flow and program/contractor control as well as allowing for sound design decision-making based on actual operational data.

Updated estimates for the Court Order indicate that the North System Tunnel component alone will cost \$100 million. The cost/benefit of the tunnel in this particular area is much

reduced, versus the South and Central areas, as it accounts for less than a third of the total estimated citywide CSO volume. Treatment, at an estimated cost of \$23 million, would save the City \$77 million. The current Court Order already allows for an evaluation of the need for this tunnel component prior to its construction.

Together, acceptance of the two deviations to the Court Order described above would save the City close to \$100 million. We believe that construction of this 2001 Modified Tunnel Plan on a schedule that would allow for assessment of the systems will not only save the City these significant funds, but will also provide the necessary CSO abatement to meet the intent of current regulations and current policy. We thus request that the EPA and DEP support our pursuit of this option if it is presented to the Federal Court.

Request for Schedule Modification

The current Court Ordered schedule requires that the South and Central tunnel systems be completed by the end of 2004, and that the entire program be completed by the end of 2009. The City is recommending that this schedule be revised to allow for the proper evaluation of the environmental effectiveness of constructed components at appropriate intervals. The recommended schedule is included as Attachment 1. This schedule is very comparable to the time frame that is required for similarly sized CSO programs in EPA's Region 1.

The proposed schedule is actually more aggressive than that of the Court Order from a cash flow standpoint. Under the proposed schedule, the majority of the South System work will have been completed by the required 12/2004 date for completion of the South and Central tunnel, but the entire budget of \$115 million will have been spent. This is a cash flow acceleration of five years, which clearly demonstrates the City's commitment to this program.

Under the proposed schedule, additional South/Central system work, plus construction of one North System screening and disinfection "demonstration" facility, would be constructed in 2005-2006. This would be followed by a two-year "time out" to operate the system and to evaluate its effectiveness. Then, in the 2009-2012 time frame, additional Central System interceptor work and the remaining North System screening and disinfection work would take place followed by a second two-year "time out" in 2013-2014 to evaluate what additional work, if any, would be required.

We request that the EPA/DEP support our recommendation of a revised schedule that will result in the expenditure of our full budget by the end of 2004 (five years ahead of schedule), and which will allow for appropriate evaluation prior to expenditure of significant additional funds.

Summary

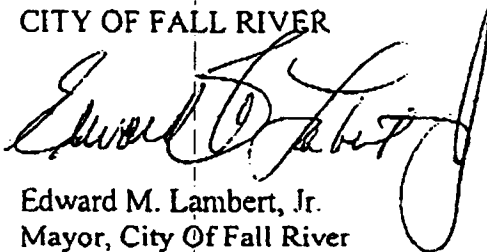
In summary, the City is requesting a response from the EPA and the DEP on three proposals:

1. The City requests an immediate written decision from the DEP and/or EPA indicating whether any plan incorporating treatment of the Mt. Hope Bay CSO outfalls with screening and disinfection will be allowed;
2. We request that the EPA and DEP support our pursuit of the Modified Tunnel Plan if it is presented to the Federal Court; and
3. We request that the EPA/DEP support our recommendation of a revised schedule that will result in the expenditure of our full budget by the end of 2004, and which will allow for appropriate evaluation prior to expenditure of significant additional funds.

These requests were discussed with representatives of EPA in Congressman Barney Frank's Office, Washington D.C., on June 20, at which time we were assured of support for an expeditious response. We would appreciate your earliest response and will be available to meet with you for discussions at your convenience.

Very truly yours,

CITY OF FALL RIVER



Edward M. Lambert, Jr.
Mayor, City Of Fall River

Cc: Ira Leighton, EPA
Robert Oroski, CDM
James A. Smith, DMS
Terrance J. Sullivan, DPW
Ronald A. Laro, DWPC

PROJECT	COST	CUMULATIVE COST	YEAR OF CONSTRUCTION															
			1996-2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015-2020
Phases 1A-1B and 2A-1	23,400,000	23,400,000																
Early Site Prep/Plant Conduit	1,500,000	24,900,000																
South-Central Tunnel	76,299,859	103,199,859																
Four Drop Shafts	4,519,605	107,719,464																
Four Direction Structures	4,622,836	112,342,300																
Tunnel Odor Control	1,984,654	114,326,954																
Five Drop Shafts	6,501,491	120,828,445																
Five Connecting Tunnels	4,560,067	125,388,512																
Five Direction Structures	5,311,418	130,699,930																
Alton St. Screening/Disinfection	5,867,175	136,567,105																
Operate & Assess																		
Quepuechan Surface Interceptor	2,295,055	138,862,160																
Pleasant St. Relief Interceptor	2,295,055	141,157,214																
North Screening/Disinfection	17,601,525	158,758,739																
Operate & Assess																		
Sewer Separation	13,911,143	172,669,882																
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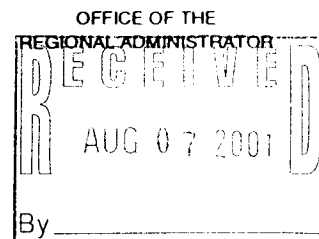
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

MAILED 11
JUL 26 2001

July 26, 2001

The Honorable Edward M. Lambert, Jr.
Mayor of Fall River
One Government Center
Fall River, MA 02722



Dear Mayor Lambert:

I have received your July 2, 2001 letter regarding combined sewer overflow (CSO) issues facing the City of Fall River. The EPA recognizes the high costs associated with addressing CSO problems and the impact that these costs have on strained municipal resources. The EPA has tried to mitigate those impacts by building substantial flexibility into CSO permitting and enforcement activities through its CSO policy. EPA considers technologies, levels of control, and schedules for CSO programs within the framework of the CSO policy.

The CSO policy emphasizes the importance of protecting high priority receiving waters. Given the potential use of Mt. Hope Bay as a shellfish resource, it would likely be inconsistent with the CSO policy to approve a CSO plan that does not protect this use when CSO control alternatives to do so appear feasible.

It is my understanding that the City of Fall River is currently subject to a consent decree that has been judicially approved. The EPA would be willing to evaluate the feasibility of the current schedule and potential alternatives in concert with the parties to the pending civil action. We will contact the Conservation Law Foundation to discuss these matters and share the outcome of those discussions with you.

Thank you for sharing your thoughts on these matters with me. Should you have further questions, please do not hesitate to contact me, or have your staff contact Michael Wagner at (617) 918-1735.

Sincerely,

Ira W. Leighton
Acting Regional Administrator

Help us serve you better. If you need to call us regarding this correspondence in the future, please reference 01-0100492.



City of Fall River Massachusetts

Edward M. Lambert, Jr.

One Government Center
Fall River, MA 02722
Tel. (508) 324-2600
Fax (508) 324-2626
(508) 324-2000 Voice/TDD

July 2, 2001

Mr. Ira Leighton, Acting Regional Administrator
US Environmental Protection Agency, Region 1
1 Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: Request of Response for CSO Proposals

Dear Mr. Leighton,

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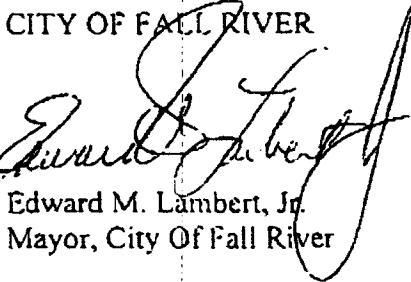
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Very truly yours,

CITY OF FALL RIVER



Edward M. Lambert, Jr.
Mayor, City Of Fall River

Cc: Paul A. Taurasi, DEP
Robert Oroski, CDM
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